

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**ADELINA C. ROCABRUNA, *et al.*,**

**Plaintiffs,**

**v.**

**Civil Action No.: 1:12-cv-506-LMB/TCB**

**BANK OF AMERICA, N.A.,**

**Defendant.**

**PLAINTIFFS' OPPOSITION TO DEFENDANT'S MOTION FOR PROTECTIVE  
ORDER**

The Plaintiffs respectfully incorporate their arguments and authorities outlined in their Memorandum and Reply Briefs in Support of their Motion to Compel as their Opposition to Defendant's Motion for Protective Order. The Plaintiffs respectfully request that the Court deny the Defendant's Motion for Protective Order.

Respectfully submitted,

**ADELINA AND MIGUEL  
ROCABRUNA**

/s/

Leonard A. Bennett, Esq. (VSB #37523)  
CONSUMER LITIGATION  
ASSOCIATES, P.C.  
763 J. Clyde Morris Boulevard, Suite 1-A  
Newport News, Virginia 23601  
(757) 930-3660 – Telephone  
(757) 930-3662 – Facsimile  
lenbennett@clalegal.com

Susan M. Rotkis, Esq. (VSB #40693)  
CONSUMER LITIGATION  
ASSOCIATES, P.C.  
763 J. Clyde Morris Boulevard, Suite 1-A  
Newport News, Virginia 23601  
(757) 930-3660 – Telephone

(757) 930-3662 – Facsimile  
srotkis@clalegal.com

Kristi Cahoon Kelly, Esq. (VSB #72791)  
Andrew J. Guzzo, Esq. (VSB #82170)  
Surovell Isaacs Petersen & Levy PLC  
4010 University Dr., Suite 200  
Fairfax, VA 22030  
703-251-5400 - Telephone  
703-591-9285 – Facsimile  
Email: kkelly@sipfirm.com  
Email: aguzzo@sipfirm.com

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 10<sup>th</sup> day of October, 2012, I will file the foregoing motion electronically using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Anand Vijay Ramana  
McGuireWoods LLP (DC)  
2001 K Street NW  
Suite 400  
Washington, DC 20006-1040  
Email: aramana@mcguirewoods.com

Brian Emory Pumphrey  
McGuireWoods LLP  
901 E Cary St  
Richmond, VA 23219-4030  
E-mail: bpumphrey@mcguirewoods.com

/s/

Kristi Cahoon Kelly, Esq. (VSB #72791)  
Surovell Isaacs Petersen & Levy PLC  
4010 University Dr., Suite 200  
Fairfax, VA 22030  
703-251-5400 - Telephone  
703-591-9285 – Facsimile  
Email: kkelly@sipfirm.com